

COMMENTER	REGULATORY TREATMENT: CMS V. PRIVATE	MAXIMUM TITLE II REGULATORY FORBEARANCE	FAVORS INTERCONNECTION/ EQUAL ACCESS REQUIREMENT	FAVORS STATE REGULATION OF INTERCONNECTION RATES	ELIMINATION OF STRUCTURAL SEPARATION REQUIREMENT
MPX Systems (Offers wide-area SMR inter- connection service)	Requests special consideration as Private carrier because of contract terms and conditions limit subscribers.	No Position Stated	No Position Stated	No Position Stated	No Position Stated
NABER	PCS: both CMS and Private Private Carrier Paging (incl. store-and- forward): CMS Traditional SMR (no frequency reuse or wide-area) and all other paging: Private	Commercial 1 (Non-dominant carriers): Yes Commercial 2 (Dominant carriers): No	Yes	No Position Stated	No Position Stated
NARUC	PCS, ESMR, paging, and existing common carriers: CMS	No Position Stated	No Position Stated	Yes	No Position Stated
National Cellular Resellers Assoc. (NCRA)	Resellers: CMS	No	Yes	Yes, only if consistent with federal policy	Yes, Commission can use marketplace solutions

COMMENTER	REGULATORY TREATMENT: CMS V. PRIVATE	MAXIMUM TITLE II REGULATORY FORBEARANCE	FAVORS INTERCONNECTION/ EQUAL ACCESS REQUIREMENT	FAVORS STATE REGULATION OF INTERCONNECTION RATES	ELIMINATION OF STRUCTURAL SEPARATION REQUIREMENT
NTCA	PCS: both CMS and Private	Yes	No Position Stated	No	No Position Stated
New Par	Cellular, PCS, SMR, ESMR, mobile satellite, and advanced messaging: CMS	Yes	No	No	No Position Stated
New York PUC	PCS: both CMS and Private	No, if FCC forbears maintains that states have <i>de novo</i> review of petitions to extend regulation authority	No Position Stated	Yes	No Position Stated
Nextel	Cellular, ESMR, and PCS: CMS	Yes	Yes	No	No
North Pittsburgh Telephone	Improved Mobile Telephone Service: Private SMR: CMS	N/A	No Position Stated	No Position Stated	No Position Stated

COMMENTER	REGULATORY TREATMENT: CMS V. PRIVATE	MAXIMUM TITLE II REGULATORY FORBEARANCE	FAVORS INTERCONNECTION/ EQUAL ACCESS REQUIREMENT	FAVORS STATE REGULATION OF INTERCONNECTION RATES	ELIMINATION OF STRUCTURAL SEPARATION REQUIREMENT
NYNEX	Cellular, SMR: CMS	Yes	No	No	Yes
	PCS: both CMS and Private	Yes			
	PCP: Private	N/A			
	Satellite: Private, if service is not offered to public on an interconnected basis	N/A			
Pacific Bell and Nevada Bell	PCS, SMR* (Private "for-profit" service), and all mobile service "for-profit" providers: CMS	Yes	Interconnection: Yes Equal Access: No	No Position Stated	No Position Stated
	Private paging, and Private, non-commercial services (Parts 90*, 80, 87, and 95): Private	N/A			
Pacific Telecom Cellular	Cellular, SMR, PCS: CMS	No Position Stated	No	No Position Stated	No Position Stated

COMMENTER	REGULATORY TREATMENT: CMS V. PRIVATE	MAXIMUM TITLE II REGULATORY FORBEARANCE	FAVORS INTERCONNECTION/ EQUAL ACCESS REQUIREMENT	FAVORS STATE REGULATION OF INTERCONNECTION RATES	ELIMINATION OF STRUCTURAL SEPARATION REQUIREMENT
PacTel Corp.	Regulatory classification should turn on the type of mobile service offered and not the frequency employed	Yes, use a self-determining notification process for carriers that offer a mix of services	No	No	Yes
PacTel Paging	Cellular, broadband PCS, ESMR: CMS Paging, narrowband PCS, and traditional SMR: Private	Yes Yes	No Position Stated	No Position Stated	No Position Stated
Pagemart, Inc.	Traditional Paging: Private	Yes	Yes	No	No Position Stated
Paging Network, Inc.	Paging: CMS	Yes	Yes	No Position Stated	No Position Stated
Personal Radio Steering Group	General Mobile Radio Service (Part 25): Private	N/A	No Position Stated	No Position Stated	No Position Stated
Pioneer Telephone Cooperative	Cellular, PCS: CMS	Yes	No	No	No Position Stated
PN Cellular, Inc.	Cellular, ESMR, PCS: CMS	Yes	No	No	No Position Stated

COMMENTER	REGULATORY TREATMENT: CMS V. PRIVATE	MAXIMUM TITLE II REGULATORY FORBEARANCE	FAVORS INTERCONNECTION/ EQUAL ACCESS REQUIREMENT	FAVORS STATE REGULATION OF INTERCONNECTION RATES	ELIMINATION OF STRUCTURAL SEPARATION REQUIREMENT
PTC Cellular	Resellers: CMS	Yes	No	No Position Stated	No Position Stated
RAM Mobile Data	Cellular, PCS, SMR (using frequency re-use and hand-off): CMS all other SMR: Private	Yes N/A	Interconnection: Yes	No Position Stated	No Position Stated
Reed Smith Shaw & McClay (law firm)	Private land mobile services (targeted to specific businesses), Mobile satellite services, and Resellers: Private	N/A	No Position Stated	No Position Stated	No Position Stated
Rig Telephones (Parts 22 Offshore Radio 21, 80, and 90 Provider)	Cellular, PCS: CMS	Yes	Yes	No Position Stated	No Position Stated
Roamer One (wireless construction)	Determine CMS and Private category on a case-by-case basis	N/A	No Position Stated	No Position Stated	No Position Stated
Rochester Telephone Corp.	PCS, wide-area SMR, paging: CMS	Yes	No Position Stated	No	No Position Stated

COMMENTER	REGULATORY TREATMENT: CMS V. PRIVATE	MAXIMUM TITLE II REGULATORY FORBEARANCE	FAVORS INTERCONNECTION/ EQUAL ACCESS REQUIREMENT	FAVORS STATE REGULATION OF INTERCONNECTION RATES	ELIMINATION OF STRUCTURAL SEPARATION REQUIREMENT
Rockwell International	Needs clarification, exclude as CMS services where facility is provided on transportable platform, but platform does not move Satellite: CMS	No Position Stated	No Position Stated	No Position Stated	No Position Stated
Rural Cellular Association (RCA)	All mobile services, incl. PCS: CMS	Yes	No Position Stated	No	No Position Stated
Southwestern Bell	Cellular, PCS, all SMR, AVM, and paging: CMS Internal services, govt'l, and public safety: Private	Yes N/A	No	No	Yes
Sprint	Cellular, PCS: CMS	Yes	No Position Stated	No Position Stated	No Position Stated
Starrys Global Positioning, Inc.	Space Segment Capacity: Private	N/A	No	N/A	No Position Stated

COMMENTS	REGULATORY TREATMENT: CMS V. PRIVATE	MAXIMUM TITLE II REGULATORY FORBEARANCE	FAVORS INTERCONNECTION/ EQUAL ACCESS REQUIREMENT	FAVORS STATE REGULATION OF INTERCONNECTION RATES	ELIMINATION OF STRUCTURAL SEPARATION REQUIREMENT
Telephone and Data Systems	Cellular and other common carriers, SMR: CMS PCS: both CMS and Private Common carrier paging and private carrier paging : Private (initially)	Yes Yes, if CMS N/A	Interconnection: Yes Equal Access: No	No Position Stated	No Position Stated
Telocator	Cellular, ESMR: CMS PCS: both CMS and Private Paging: either CMS or Private, but uniform rules	Yes Yes, if CMS	Interconnection: Yes Equal Access: No	No	No Position Stated
Time Warner	PCS: both CMS and Private	Yes	Interconnection: Yes	Yes, if consistent with federal policy	No Position Stated
TRW	Space Segment Capacity and Mobile Satellite Service/ Radiodetermination Satellite Service: Private	Yes	Interconnection: Yes	No	No Position Stated

COMMENTER	REGULATORY TREATMENT: CMS V. PRIVATE	MAXIMUM TITLE II REGULATORY FORBEARANCE	FAVORS INTERCONNECTION/EQUAL ACCESS REQUIREMENT	FAVORS STATE REGULATION OF INTERCONNECTION RATES	ELIMINATION OF STRUCTURAL SEPARATION REQUIREMENT
USTA	<p>All common carrier services, PCS, SMR, paging, and shared private land mobile systems (if provided "for profit"): CMS</p> <p>Private land mobile services (if only provides dispatch service): Private</p>	<p>Yes, if forbearance is uniformly applied to all CMS providers</p> <p>N/A</p>	Interconnection: Yes	No Position Stated	No Position Stated
US West	PCS: CMS (even if providing a mix of services)	Yes	<p>Interconnection: Yes</p> <p>Equal Access: No, recommends expansion of the scope of "Equal Access" proceeding to encompass all CMS providers</p>	Yes	No Stated Position
Utilities Telecom. Council	<p>PCS: both CMS and Private</p> <p>Private non-commercial land mobile radio, esp. Industrial Radio: Private</p>	<p>Yes</p> <p>N/A</p>	No Position Stated	No Position Stated	No Position Stated

COMMENTER	REGULATORY TREATMENT: CMS V. PRIVATE	MAXIMUM TITLE II REGULATORY FORBEARANCE	FAVORS INTERCONNECTION/ EQUAL ACCESS REQUIREMENT	FAVORS STATE REGULATION OF INTERCONNECTION RATES	ELIMINATION OF STRUCTURAL SEPARATION REQUIREMENT
Vanguard Cellular	Cellular, PCS, Wide- Area and Enhanced SMR, Mobile Data: CMS	Yes	Interconnection: Yes Equal Access: No	No Position Stated	No Position Stated
	Mobile Satellite: Private	N/A			
Waterway Comm. Systems (Maritime Common Carrier)	Maritime Common Carrier: CMS	Yes	No Position Stated	No Position Stated	No Position Stated